REACH at Blaser Swisslube

A summary from Dr. Martin Manikowski Head of Research and Development

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REACH: Registration, Evaluation and Authorisation of Chemicals On the 1st of June 2007, a new European Law - REACH - entered into force.



REACH: What is it?

The EU has through the introduction of the REACH legislation, the goal of protecting both the health of people within the EU and limiting damage to the environment. This law ensures that the chemicals in use within the EU are registered and evaluated. That means their human and environmental impact is determined. After the process is complete registered chemicals will be authorised for use in defined application areas.

Thus, only chemicals which have been Pre-registered and then fully Registered within the 10 year staged period allowed by REACH can be used within the EU. Each producer or importer who wants to market substances (as described in REACH) must have a Registration number for this material.

• What does REACH mean for Blaser Swisslube?

Blaser Swisslube has to contact all of its suppliers to make sure that the materials they supply to us are included in the registration dossiers and that the use of the raw materials is clearly defined. Thus, our suppliers have to know that their products are used in e.g. metalworking fluids. Additionally, Blaser Swisslube manufactures certain materials for use in its products and these have to be placed into the registration process.

• What does REACH mean for our customers?

Customers using Blaser Swisslube products in their designed applications (metal working) and using normal disposal procedures, will be automatically covered by the REACH processes made by Blaser Swisslube and its suppliers. We will, as part of our REACH programme, automatically pass information "upstream" to our suppliers.

For the first time, the approval procedure will involve the customers in the chain who use the materials (termed Downstream Users) in order to build up an exposure scenario and safety management measures.

HOWEVER, if Blaser products are used in an entirely new way by our customers, Blaser Swisslube has to be informed so that we can advise them properly about additional REACH implications.

• What impact could REACH have on Blaser Swisslube's product range? REACH is predicted to have a profound impact on the chemicals industry, on suppliers and users. It might be that some raw materials will not make it through REACH. As on previous occasions we will have to replace these unapproved or withdrawn raw materials. We expect no major reduction in substances available to us as raw materials. If a raw material were to be no longer available, then as before, it would be replaced and our customers would be informed about this. However, we are confident that this will be a rare event as we work with leading

The position of Blaser Swisslube

suppliers and with available raw materials.

We consider ourselves to be in a good situation, as all the raw materials affected by REACH have been registered either by our suppliers or directly by Blaser Swisslube within the set time limit. We have complied with the registration requirements in full. Blaser Swisslube is careful to ensure that no CMR ingredients are included in its products. And it goes without saying that our Safety Data Sheets are REACH-conform. Information on SVHC is given in an additional confirmation letter and also in the continuously updated Material Safety Data Sheets

SVHC: Substance of very high concern

CMR: cancerogenic, mutagenic toxic to reproduction

• Where do we stand with the implementation?

We are on course. The substances contained in the products supplied by Blaser Swisslube meet the requirements on pre-registration and registration in accordance with REACH (EU Directive 1907/2006) by meeting one of the following points:

- The volume delivered by Blaser Swisslube AG into the EU amounts to less than 1 metric ton per year
- The substance has already been registered in the supply chain (re-import in accordance with REACH Art. 2)
- The substance has been pre-registered by an exclusive agent (BMG Engineering GmbH, OR18) and the deadline for the registration is 2018.

We confirm that the conditions for exceptions for re-imports in accordance with REACH Art. 2 have been met for substances already registered.

Dr. Martin Manikowski Head of Research and Development

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• If you need further information about REACH, please contact:

Desiree Wilson, Head of Product Stewardship +41 (0)34 460 08 48 reach@blaser.com

